

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAULA DISBERRY,

Plaintiff,

v.

EMPLOYEE RELATIONS COMMITTEE
OF THE COLGATE-PALMOLIVE
COMPANY, ALIGHT SOLUTIONS LLC,
AND BANK OF NEW YORK MELLON
CORPORATION,

Defendants.

Case No. 22-CV-5778-CM-OTW

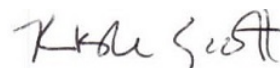
**DECLARATION OF KIRSTEN G.
SCOTT IN SUPPORT OF PLAINTIFF'S
MEMORANDA OF LAW IN
OPPOSITION TO DEFENDANTS'
MOTIONS TO DISMISS PLAINTIFF'S
COMPLAINT**

I, Kirsten G. Scott, declare as follows:

1. I am a partner with Renaker Scott LLP, which is co-counsel for Plaintiff in this action together with Brustein Law PLLC. I have personal knowledge of the facts set forth below and, if called upon to do so, could and would testify competently thereto.
2. Attached hereto as Exhibit 1 is a true and correct copy of the Colgate-Palmolive Company Employees Savings and Investment Plan.
3. Attached hereto as Exhibit 2 is a true and correct copy of the complaint filed in *Berman v. Estee Lauder Inc.*, No. 4:19-cv-06489, in the U.S. District Court, Northern District of California, on November 9, 2019.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 29, 2022



Kirsten G. Scott